

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

SEBASTIAN NEGRON TORRES

**DEBTOR**

**CASE NO.: 22-1893  
CHAPTER 13**

**MOTION FOR CONTINUATION OF THE AUTOMATIC STAY IN CASE FILED  
AFTER PRIOR DISMISSAL WITHIN ONE YEAR OF FILING**

**TO HONORABLE COURT:**

COMES NOW DEBTOR, through the undersigned attorney and respectfully STATES, ALLEGES AND PRAYS:

1. The Debtor notify all Creditors and Parties in interest and hereby moves this Court, pursuant to § 362(c)(3)(B), for an order continuing the automatic stay provided under § 362(a) as to all creditors. In support of this motion, the Debtor states as follows.
2. The Debtor filed a petition under chapter 13 on June 30, 2022 .
3. The Debtor has previously filed a chapter 13 case on November 16, 2021, case number 21-03391, that was dismissed on April 18, 2022. This case was dismissed because Debtor fell in arrears with the chapter 13 payment plan and also because he could not appear at the 341 meeting of creditors due to the fact that he lost his Social Security card and could not obtain a duplicate on time.
4. The Debtor has special circumstances and changes that will allow him to complete the new chapter 13 plan.
5. Debtor have more income now since he was recently employed in a new job with a higher salary and he also have his new Social Security card.

6. The petition in this case has been filed in good faith. The Debtor believes that the chapter 13 plan they have submitted will be confirmed and that he will be able to fully perform under the terms of the plan.
7. Debtor's prior chapter 13 case, dismissed on April 18, 2022, was the only previous case by the Debtor that was pending during the preceeding year.
8. The Debtor's prior chapter 13 case was not dismissed because the Debtor failed to file or amend the petition or to provide adequate protection ordered by the court.
9. The Debtors understands that the automatic stay issued by this Honorable Court on June 30, 2022, continues to protect property of the estate as long it remains property of the estate as it does in this bankruptcy petition. However, the Debtor needs that the automatic stay be extended against all creditors during the remainder of the case to avoid any collection efforts against the Debtors by the creditors

**WHEREFORE**, the Debtor requests that this Honorable Court continue the automatic stay under section 362(a) as to all Creditors for the duration of this chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

## ***NOTICE***

**“Parties in interest are hereby granted eleven (11) days from the date of this notice and request a hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as contested matter. Absent good cause, untimely rejections shall be denied.”**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY: that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF Filing System which sends notification of such filing to all those who is this case have registered for receipt of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at [ustpregion21.hrecf@usdoj.gov](mailto:ustpregion21.hrecf@usdoj.gov) and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants: Debtor(s) and the mailing address of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 30<sup>th</sup> day of June 2022.

/S/**Víctor C. Thomas Santiago**  
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Label Matrix for local noticing 0104-3 Case 22-01893-13 District of Puerto Rico Old San Juan Thu Jun 30 16:39:51 AST 2022	US Bankruptcy Court District of P.R. Jose V Toledo Fed Bldg & US Courthouse 300 Recinto Sur Street, Room 109 San Juan, PR 00901-1964	DEPARTAMENTO DE HACIENDA DE PR BANKRUPTCY DEPARTMENT PO BOX 9024140 SAN JUAN, PR 00902-4140
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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